

**FEDERALLY ENFORCEABLE STATE  
OPERATING PERMIT (FESOP)  
OFFICE OF AIR QUALITY**

**VIM Recycling, Inc.  
64654 U.S. Highway 33  
Goshen, Indiana 46526**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F-039-12395-00184	
Issued by: Original Signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: March 19, 2002  Expiration Date: March 19, 2007

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## SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information [326 IAC 2-8-3(b)]

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The Permittee owns and operates a source that manufactures wood, plastic, and gypsum products using recycled wood, plastic, and gypsum as raw materials.

Authorized individual:	Kenneth R. Will
Source Address:	65654 U.S. Highway 33, Goshen, Indiana 46526
Mailing Address:	65654 U.S. Highway 33, Goshen, Indiana 46526
Phone Number:	219-652-3677
SIC Code:	4953
Source Location Status:	Elkhart
County Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP)

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

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This stationary source consists of the following emission units and pollution control devices:

#### Wood Product Line

- (a) One (1) wood hog grinder with a maximum capacity to grind 25 tons of wood per hour, using one (1) cyclone/baghouse (WCD-1) for controlling particulate matter and exhausting to one (1) stack designated WS-1.
- (b) One (1) wood product conveyor with a maximum capacity to convey 25 tons of wood per hour, using one (1) cyclone/baghouse (WCD-1) for controlling particulate matter and exhausting to one (1) stack designated WS-1.

#### Plastic Product Line

- (a) One (1) vinyl hog grinder with a maximum capacity to grind 2.5 tons of polyethylene or polyvinyl chloride per hour, using one (1) cyclone/baghouse (VCD-1) for controlling particulate matter and exhausting to one (1) stack designated VS-1.

#### Gypsum Product Line

- (a) One gypsum shredder with a maximum capacity to shred 15 tons of gypsum per hour, using one (1) cyclone/baghouse (GCD-1) for controlling particulate matter and exhausting to one (1) stack designated GS-1.
- (b) One (1) gypsum product conveyor with a maximum capacity to convey 15 tons of gypsum per hour, using one (1) cyclone/baghouse (GCD-1) for controlling particulate matter and exhausting to one (1) stack designated GS-1.
- (c) One (1) gypsum hammer mill with a maximum capacity to crush 15 tons of gypsum per hour, using one (1) cyclone/baghouse (GCD-1) for controlling particulate matter and exhausting to one (1) stack designated GS-1.

- (d) One (1) gypsum products classifier with a maximum capacity to process 15 tons of gypsum per hour, using one (1) cyclone/baghouse (GCD-1) for controlling particulate matter and exhausting to one (1) stack designated GS-1.
- (e) One (1) gypsum rock auger with a maximum capacity to process 15 tons of gypsum per hour, using one (1) cyclone/baghouse (GCD-1) for controlling particulate matter and exhausting to one (1) stack designated GS-1.
- (f) One (1) gypsum powder silo with a maximum storage capacity of 15 tons of gypsum per hour, using one (1) cyclone/baghouse (GCD-1) for controlling particulate matter and exhausting to one (1) stack designated GS-1.

**Paper Conveyor**

- (a) One (1) paper conveyor with a maximum convey 4 tons of paper per hour and exhausting to the atmosphere.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Three (3) natural gas-fired forced air heaters with a heat input less than or equal to ten (10) million Btu per hour:
  - (1) FA-1, 0.1 MMBtu/hr.
  - (2) FA-2, 0.1 MMBtu/hr.
  - (3) FA-3, 0.1 MMBtu/hr.
- (b) Two (2) natural gas-fired radiant heaters with a heat input less than or equal to ten (10) million Btu per hour:
  - (1) RH-1, 0.05 MMBtu/hr.
  - (2) RH-2, 0.05 MMBtu/hr.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) for a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either
  - (1) incorporated as originally stated,
  - (2) revised, or
  - (3) deletedby this permit.
- (b) All previous registrations and permits are superseded by this permit.

## SECTION B GENERAL CONDITIONS

### B.1 Permit No Defense [IC 13]

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

### B.2 Definitions [326 IAC 2-8-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2, and 326 IAC 2-7) shall prevail.

### B.3 Permit Term [326 IAC 2-8-4(2)]

This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

### B.4 Enforceability [326 IAC 2-8-6]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

### B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

### B.6 Severability [326 IAC 2-8-4(4)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

### B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

### B.8 Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)] [326 IAC 2-8-5(a)(4)]

- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee



shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality.[326 IAC 2-8-4(5)(E)]

- (c) The Permittee may include a claim of confidentiality in accordance with 326 IAC 17. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

**B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]**

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IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

**B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]**

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- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:
- (1) Enforcement action;
  - (2) Permit termination, revocation and reissuance, or modification; and
  - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- (c) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in condition B, Emergency Provisions.

**B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]**

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- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an authorized individual of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

**B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]**

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- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
  - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was continuous or intermittent;
  - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
  - (5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

**B.13 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]**

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:
  - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

The PMP and the PMP extension notification do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

**B.14 Emergency Provisions [326 IAC 2-8-12]**

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- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:
  - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
  - (2) The permitted facility was at the time being properly operated;
  - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
  - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;  
  
Telephone No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section) or,  
Telephone No.: 317-233-5674 (ask for Compliance Section)  
Facsimile No.: 317-233-5967  
  
Failure to notify IDEM, OAQ by telephone or facsimile within four (4) daytime business hours after the beginning of the emergency, or after the emergency is discovered or reasonably should have been discovered, shall constitute a violation of 326 IAC 2-8 and any other applicable rules. [326 IAC 2-8-12(f)]
  - (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
  - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
  - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
    - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
    - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

**B.15** Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

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- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.
- (c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

**B.16** Permit Modification, Reopening, Revocation and Reissuance, or Termination  
[326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

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- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
- (1) That this permit contains a material mistake.
  - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
  - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty

(30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

**B.17 Permit Renewal [326 IAC 2-8-3(h)]**

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- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, IN 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]

- (1) A timely renewal application is one that is:

- (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
- (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

- (2) If IDEM, OAQ upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

- (c) Right to Operate After Application for Renewal [326 IAC 2-8-9]  
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as needed to process the application.

**B.18 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]**

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- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

**B.19 Operational Flexibility [326 IAC 2-8-15]**

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- (a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:
- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
  - (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
  - (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
  - (4) The Permittee notifies the:  
  
Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015  
  
and  
  
United States Environmental Protection Agency, Region V  
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590  
  
in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and
  - (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.  
  
Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-8-15(b), (c)(1), and (d).
- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-8-15(a) and the following additional conditions:
- (1) A brief description of the change within the source;
  - (2) The date on which the change will occur;

- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

- (c) Emission Trades [326 IAC 2-8-15(c)]  
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (d) Alternative Operating Scenarios [326 IAC 2-8-15(d)]  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

**B.20 Permit Revision Requirement [326 IAC 2-8-11.1]**

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

**B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2]**

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

**B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]**

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:



Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-11(b)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

## SECTION C SOURCE OPERATION CONDITIONS

Entire Source
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### Emissions Limitations and Standards [326 IAC 2-8-4(1)]

#### C.1 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate mater (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period. This limitation shall also make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) and 326 IAC 2-3 (Emission Offset) not applicable.
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.

(c) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

#### C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

#### C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

#### C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

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The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

C.6 Operation of Equipment [326 IAC 2-8-5(a)(4)]

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Except as otherwise provided by statute, rule or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission unit(s) vented to the control equipment are in operation.

C.7 Stack Height [326 IAC 1-7]

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The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

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- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
  - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
  - (2) If there is a change in the following:
    - (A) Asbestos removal or demolition start date;
    - (B) Removal or demolition contractor; or
    - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management  
Asbestos Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The

notifications do not require a certification by the "authorized individual" as defined by 326 IAC2-1.1-1(1).

- (e) Procedures for Asbestos Emission Control  
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) Indiana Accredited Asbestos Inspector  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

### **Testing Requirements [326 IAC 2-8-4(3)]**

#### **C.9 Performance Testing [326 IAC 3-6]**

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- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

### **Compliance Requirements [326 IAC 2-1.1-11]**

#### **C.10 Compliance Requirements [326 IAC 2-1.1-11]**

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The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

### **Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

#### **C.11 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]**

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule with full justification of the reasons for inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Unless otherwise specified in the approval for the new emissions unit, compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

#### **C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]**

Any monitoring or testing performed required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63 or other approved methods as specified in this permit.

#### **C.13 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)] [326 IAC 2-8-5(1)]**

- (a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ( $\pm 2\%$ ) of full scale reading.
- (b) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

### **Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

#### **C.14 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]**

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

within ninety (90) days from the date of issuance of this permit.

**C.15 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]**

---

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

- (a) A compliance schedule for meeting the requirements of 40 CFR 68; or
- (b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP).

All documents submitted pursuant to this condition shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

**C.16 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-8-4] [326 IAC 2-8-5]**

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- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:
  - (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.
  - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
  - (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
  - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
  - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the

applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.

- (4) Failure to take reasonable response steps shall constitute a violation of the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
  - (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
  - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.
  - (3) An automatic measurement was taken when the process was not operating.
  - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4]  
[326 IAC 2-8-5]

- 
- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
  - (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
  - (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

### **Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]**

#### **C.18 Emission Statement [326 IAC 2-6] [326 IAC 2-8-4(3)]**

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- (a) The Permittee shall submit an emission statement certified pursuant to the requirements of 326 IAC 2-6. This statement must be received in accordance with the compliance schedule specified in 326 IAC 2-6-3 and must comply with the minimum requirements specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8). The statement must be submitted to:

Indiana Department of Environmental Management  
Technical Support and Modeling Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The emission statement does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

#### **C.19 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]**

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- (a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

#### **C.20 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]**

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- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015



- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The report does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) The first report covered the period commencing on the date of issuance of the original FESOP permit and ended on the last day of the reporting period. All subsequent reporting periods shall be based on calendar years.

C.21 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156
- (b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

## SECTION D.1 FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-8-4(10)]:

#### Wood Product Line

- (a) One (1) wood hog grinder with a maximum capacity to grind 25 tons of wood per hour, using one (1) cyclone/baghouse (WCD-1) for controlling particulate matter and exhausting to one (1) stack designated WS-1.
- (b) One (1) wood product conveyor with a maximum capacity to convey 25 tons of wood per hour, using one (1) cyclone/baghouse (WCD-1) for controlling particulate matter and exhausting to one (1) stack designated WS-1.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-8-4(1)]

#### D.1.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate from the woodworking facilities shall not exceed 35.4 pounds per hour when operating at a process weight rate of 50,000 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and  
P = process weight rate in tons per hour

#### D.1.2 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

The source will limit PM emissions to less than 250 tons per year and will render 326 IAC 2-2 (PSD Rules) not applicable. The source will be in compliance with the limitation by controlling PM emissions with a cyclone and baghouse, in series. The PM emissions will be limited as follows:

Emission Unit	Allowable PM Emissions (lb/hr)
Wood product line (WCD-1)	1.63

#### D.1.3 FESOP PM10 Limit [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4 (FESOP), the source will limit PM10 emissions to less than 100 tons per year and will render 326 IAC 2-7 (Part 70 Permit Program) not applicable. The source will be in compliance with the limitation by controlling PM10 emissions with a cyclone and baghouse, in series. The PM10 emissions will be limited as follows:

Emission Unit	Allowable PM10 Emissions (lb/hr)
Wood product line (WCD-1)	1.63

#### D.1.4 Storage Piles

- (a) Pursuant to Agreed Orders 2000-9603-A and 2000-9849-A signed on August 23, 2001, outdoor storage piles at the source shall:
- (1) Be maintained with a maximum height of twenty (20) feet and a seventy-five (75) foot barrier between the storage pile(s) and the facility property line (effective January 1, 2002), and
  - (2) Not be located south of the imaginary line running east-to-west across the northern face of the facilities northern-most building (effective May 1, 2002).
- (b) Pursuant to Agreed Orders 2000-9603-A and 2000-9849-A signed on August 23, 2001, no screening or other processing of any materials that could create fugitive dust emissions shall be conducted outdoors (effective January 1, 2002). Moving or loading of material is allowed.

#### D.1.5 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

### Compliance Determination Requirements

#### D.1.6 Testing Requirements

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the particulate matter (PM) limit specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

#### D.1.7 Particulate Matter (PM)

Pursuant to CP-039-3530-00184, issued on June 15, 1995, the wood products cyclone and baghouse for PM control shall be in operation and control emissions from the wood products line at all times that the wood hog grinder and wood product conveyor are in operation.

### Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

#### D.1.8 Visible Emissions Notations

- (a) Daily visible emission notations of the wood hog grinder and wood product conveyor stack exhaust shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

#### D.1.9 Parametric Monitoring

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The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the woodworking process, at least once weekly when the woodworking process is in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

#### D.1.10 Storage Piles

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Pursuant to Agreed Orders 2000-9603-A and 2000-9849-A signed on August 23, 2001, the source shall inspect all ground wood material stored outside for signs of spontaneous combustion. Any fire discovered shall be extinguished immediately.

### **Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

#### D.1.11 Record Keeping Requirements

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- (a) To document compliance with Condition D.1.8, the Permittee shall maintain records of daily visible emission notations of the wood products cyclone/baghouse stack exhaust.
- (b) To document compliance with Condition D.1.9, the Permittee shall maintain the following:
  - (1) Weekly records of the following operational parameters during normal operation when venting to the atmosphere:
    - (A) Inlet and outlet differential static pressure; and
    - (B) Cleaning cycle: frequency and differential pressure.
  - (2) Documentation of all response steps implemented, per event .
  - (3) Operation and preventive maintenance logs, including work purchases orders, shall be maintained.
  - (4) Quality Assurance/Quality Control (QA/QC) procedures.
  - (5) Operator standard operating procedures (SOP).
  - (6) Manufacturer's specifications or its equivalent.

- (7) Equipment "troubleshooting" contingency plan.
- (8) Documentation of the dates vents are redirected.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.
- (d) To document compliance with Condition D.1.10, the Permittee shall maintain records of the visual inspections of outdoor ground wood storage piles.

#### D.1.12 Reporting Requirements

Records of the information specified in Condition D.1.10 and D.1.11 shall be maintained for a minimum period of 24 months and made available upon request of the Office of Air Quality.

## SECTION D.2 FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-8-4(10)]:

#### Plastic Product Line

- (a) One (1) vinyl hog grinder with a maximum capacity to grind 2.5 tons of polyethylene or polyvinyl chloride per hour, using one (1) cyclone/baghouse (VCD-1) for controlling particulate matter and exhausting to one (1) stack designated VS-1.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-8-4(1)]

#### D.2.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate from the plastic products line shall not exceed 7.6 pounds per hour when operating at a process weight rate of 1,000 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and  
P = process weight rate in tons per hour

#### D.2.2 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

The source will limit PM emissions to less than 250 tons per year and will render 326 IAC 2-2 (PSD Rules) not applicable. The source will be in compliance with the limitation by controlling PM emissions with a cyclone and baghouse, in series. The PM emissions will be limited as follows:

Emission Unit	Allowable PM Emissions (lb/hr)
Plastic product line (VCD-1)	0.51

#### D.2.3 FESOP PM10 Limit [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4 (FESOP), the source will limit PM10 emissions to less than 100 tons per year and will render 326 IAC 2-7 (Part 70 Permit Program) not applicable. The source will be in compliance with the limitation by controlling PM10 emissions with a cyclone and baghouse, in series. The PM10 emissions will be limited as follows:

Emission Unit	Allowable PM10 Emissions (lb/hr)
Plastic product line (VCD-1)	0.51

#### D.2.4 Storage Piles

---

- (a) Pursuant to Agreed Orders 2000-9603-A and 2000-9849-A signed on August 23, 2001, outdoor storage piles at the source shall:
  - (1) Be maintained with a maximum height of twenty (20) feet and a seventy-five (75) foot barrier between the storage pile(s) and the facility property line (effective January 1, 2002), and
  - (2) Not be located south of the imaginary line running east-to-west across the northern face of the facilities northern-most building (effective May 1, 2002).
- (b) Pursuant to Agreed Orders 2000-9603-A and 2000-9849-A signed on August 23, 2001, no screening or other processing of any materials that could create fugitive dust emissions shall be conducted outdoors (effective January 1, 2002). Moving or loading of material is allowed.

### Compliance Determination Requirements

#### D.2.5 Testing Requirements

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The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the particulate matter (PM) limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

#### D.2.6 Particulate Matter (PM)

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Pursuant to CP-039-3530-00184, issued on June 15, 1995, the plastic products cyclone and baghouse for PM control shall be in operation and control emissions from the plastic products line at all times that the vinyl hog grinder is in operation.

### Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

#### D.2.7 Visible Emissions Notations

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- (a) Daily visible emission notations of the plastic products cyclone and baghouse stack exhaust shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

#### D.2.8 Parametric Monitoring

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The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the plastic grinding process, at least once weekly when the plastic grinding

process is in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

#### **D.2.9 Baghouse Inspections**

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- (a) An inspection shall be performed each calendar quarter of all bags controlling the plastic grinding operation when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting indoors. All defective bags shall be replaced.
- (b) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

#### **D.2.10 Broken or Failed Bag Detection**

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In the event that bag failure has been observed:

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

### **Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

#### **D.2.11 Record Keeping Requirements**

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- (a) To document compliance with Condition D.2.7, the Permittee shall maintain records of daily visible emission notations of the plastic products cyclone and baghouse stack exhaust.
- (b) To document compliance with Condition D.2.8, the Permittee shall maintain the following:
  - (1) Weekly records of the following operational parameters during normal operation when venting to the atmosphere:



- (A) Inlet and outlet differential static pressure; and
- (B) Cleaning cycle: frequency and differential pressure.
- (2) Documentation of all response steps implemented, per event .
- (3) Operation and preventive maintenance logs, including work purchases orders, shall be maintained.
- (4) Quality Assurance/Quality Control (QA/QC) procedures.
- (5) Operator standard operating procedures (SOP).
- (6) Manufacturer's specifications or its equivalent.
- (7) Equipment "troubleshooting" contingency plan.
- (8) Documentation of the dates vents are redirected.
- (c) To document compliance with Condition D.2.9, the Permittee shall maintain records of the results of the inspections required under Condition D.2.9 and those additional inspections prescribed by the Preventive Maintenance Plan, and the dates the vents were redirected.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.2.12 Reporting Requirements

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Records of the information specified in Condition D.2.11 shall be maintained for a minimum period of 24 months and made available upon request of the Office of Air Quality.

## SECTION D.3

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-8-4(10)]:

#### Gypsum Product Line

- (a) One gypsum shredder with a maximum capacity to shred 15 tons of gypsum per hour, using one (1) cyclone/baghouse (GCD-1) for controlling particulate matter and exhausting to one (1) stack designated GS-1.
- (b) One (1) gypsum product conveyor with a maximum capacity to convey 15 tons of gypsum per hour, using one (1) cyclone/baghouse (GCD-1) for controlling particulate matter and exhausting to one (1) stack designated GS-1
- (c) One (1) gypsum hammer mill with a maximum capacity to crush 15 tons of gypsum per hour, using one (1) cyclone/baghouse (GCD-1) for controlling particulate matter and exhausting to one (1) stack designated GS-1
- (d) One (1) gypsum products classifier with a maximum capacity to process 15 tons of gypsum per hour, using one (1) cyclone/baghouse (GCD-1) for controlling particulate matter and exhausting to one (1) stack designated GS-1
- (e) One (1) gypsum rock auger with a maximum capacity to process 15 tons of gypsum per hour, using one (1) cyclone/baghouse (GCD-1) for controlling particulate matter and exhausting to one (1) stack designated GS-1
- (f) One (1) gypsum powder silo with a maximum storage capacity of 15 tons of gypsum per hour, using one (1) cyclone/baghouse (GCD-1) for controlling particulate matter and exhausting to one (1) stack designated GS-1.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-8-4(1)]

#### D.3.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate from the gypsum products line shall not exceed 25.2 pounds per hour when operating at a process weight rate of 30,000 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and  
P = process weight rate in tons per hour

#### D.3.2 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

The source will limit PM emissions to less than 250 tons per year and will render 326 IAC 2-2 (PSD Rules) not applicable. The source will be in compliance with the limitation by controlling PM emissions with a cyclone and baghouse, in series. The PM emissions will be limited as follows:

Emission Unit	Allowable PM Emissions (lb/hr)
Gypsum product line (GCD-1)	1.63

#### D.3.3 FESOP PM10 Limit [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4 (FESOP), the source will limit PM10 emissions to less than 100 tons per year and will render 326 IAC 2-7 (Part 70 Permit Program) not applicable. The source will be in compliance with the limitation by controlling PM10 emissions with a cyclone and baghouse, in series. The PM10 emissions will be limited as follows:

Emission Unit	Allowable PM10 Emissions (lb/hr)
Gypsum product line (GCD-1)	1.63

#### D.3.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

#### D.3.5 Storage Piles

- (a) Pursuant to Agreed Orders 2000-9603-A and 2000-9849-A signed on August 23, 2001, outdoor storage piles at the source shall:
- (1) Be maintained with a maximum height of twenty (20) feet and a seventy-five (75) foot barrier between the storage pile(s) and the facility property line (effective January 1, 2002), and
  - (2) Not be located south of the imaginary line running east-to-west across the northern face of the facilities northern-most building (effective May 1, 2002).
- (b) Pursuant to Agreed Orders 2000-9603-A and 2000-9849-A signed on August 23, 2001, no screening or other processing of any materials that could create fugitive dust emissions shall be conducted outdoors (effective January 1, 2002). Moving or loading of material is allowed.

### Compliance Determination Requirements

#### D.3.6 Testing Requirements

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the particulate matter (PM) limit specified in Condition D.3.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

#### D.3.7 Particulate Matter (PM)

Pursuant to CP-039-3530-00184, issued on June 15, 1995, the gypsum products cyclone and baghouse for PM control shall be in operation and control emissions from the gypsum products line at all times that the gypsum shredder, gypsum product conveyor, gypsum hammer mill, gypsum products classifier, gypsum rock auger, and gypsum powder silo are in operation.

## **Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

### **D.3.8 Visible Emissions Notations**

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- (a) Daily visible emission notations of the gypsum products cyclone and baghouse stack exhaust shall be performed during once per shift normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

### **D.3.9 Parametric Monitoring**

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The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the shredding, conveying, hammer milling, classifying, augering, and storage processes at least once weekly when the shredding, conveying, hammer milling, classifying, augering, and storage processes are in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

### **D.3.10 Baghouse Inspections**

---

- (a) An inspection shall be performed each calendar quarter of all bags controlling the gypsum shredding, conveying, hammer milling, classifying, augering, and storage operations when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting indoors. All defective bags shall be replaced.
- (b) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

### **D.3.11 Broken or Failed Bag Detection**

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In the event that bag failure has been observed:

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure,

response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

- (b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

### **Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

#### **D.3.12 Record Keeping Requirements**

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- (a) To document compliance with Condition D.3.8, the Permittee shall maintain records of daily visible emission notations of the gypsum products cyclone and baghouse stack exhaust.
- (b) To document compliance with Condition D.3.9, the Permittee shall maintain the following:
  - (1) Weekly records of the following operational parameters during normal operation when venting to the atmosphere:
    - (A) Inlet and outlet differential static pressure; and
    - (B) Cleaning cycle: frequency and differential pressure.
  - (2) Documentation of all response steps implemented, per event .
  - (3) Operation and preventive maintenance logs, including work purchases orders, shall be maintained.
  - (4) Quality Assurance/Quality Control (QA/QC) procedures.
  - (5) Operator standard operating procedures (SOP).
  - (6) Manufacturer's specifications or its equivalent.
  - (7) Equipment "troubleshooting" contingency plan.
  - (8) Documentation of the dates vents are redirected.
- (c) To document compliance with Condition D.3.10, the Permittee shall maintain records of the results of the inspections required under Condition D.3.7 and those additional inspections prescribed by the Preventive Maintenance Plan, and the dates the vents are redirected.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### **D.3.13 Reporting Requirements**

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Records of the information specified in Condition D.3.12 shall be maintained for a minimum period of 24 months and made available upon request of the Office of Air Quality.

## SECTION D.4

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-8-4(10)]:

#### Paper Conveyor

- (a) One (1) paper conveyor with a maximum convey 4 tons of paper per hour and exhausting to the atmosphere.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-8-4(1)]

#### D.4.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate from the paper conveyor shall not exceed 10.40 pounds per hour when operating at a process weight rate of 8,000 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10P^{0.67}$$

where E = rate of emission in pounds per hour, and  
P = process weight rate in tons per hour

#### D.4.2 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

The source will limit PM emissions to less than 250 tons per year and will render 326 IAC 2-2 (PSD Rules) not applicable. The source will limit PM emissions by complying with the allowable PM emission limit specified in Condition D.5.1.

#### D.4.3 FESOP PM10 Limit [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4 (FESOP), the source will limit PM10 emissions to less than 100 tons per year and will render 326 IAC 2-7 (Part 70 Permit Program) not applicable. The source will limit PM10 emissions by complying with the allowable PM emission limit specified in Condition D.5.1.

#### D.4.4 Storage Piles

- (a) Pursuant to Agreed Orders 2000-9603-A and 2000-9849-A signed on August 23, 2001, outdoor storage piles at the source shall:
- (1) be maintained with a maximum height of twenty (20) feet and a seventy-five (75) foot barrier between the storage pile(s) and the facility property line (effective January 1, 2002), and
  - (2) not be located south of the imaginary line running east-to-west across the northern face of the facilities northern-most building (effective May 1, 2002).
- (b) Pursuant to Agreed Orders 2000-9603-A and 2000-9849-A signed on August 23, 2001, no screening or other processing of any materials that could create fugitive dust

emissions shall be conducted outdoors (effective January 1, 2002). Moving or loading of material is allowed.

- (c) Pursuant to Agreed Orders 2000-9603-A and 2000-9849-A signed on August 23, 2001, no biomass shall be on-site unless the material is used as a berm and the material is seeded with erosion-preventing vegetation (effective May 1, 2002).

## **Compliance Determination Requirements**

### **D.4.5 Testing Requirements**

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The permitted is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the particulate matter (PM) limit specified in Condition D.5.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

## **Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

### **D.4.6 Visible Emissions Notations**

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- (a) Visible emission notations of the paper conveyor shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

## **Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

### **D.4.7 Record Keeping Requirements**

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- (a) To document compliance with Condition D.4.6, the Permittee shall maintain records of visible emission notations of the paper conveyor stack exhaust once per shift.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

### **D.4.8 Reporting Requirements**

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Records of the information specified in Condition D.4.7 shall be maintained for a minimum period of 24 months and made available upon request of the Office of Air Quality.



## SECTION D.5

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-8-4(10)]:

#### Insignificant Activities

- (a) Three (3) natural gas-fired forced air heaters with a heat input less than or equal to ten (10) million Btu per hour:
  - (1) FA-1, 0.1 MMBtu/hr.
  - (2) FA-2, 0.1 MMBtu/hr.
  - (3) FA-3, 0.1 MMBtu/hr.
- (b) Two (2) natural gas-fired radiant heaters with a heat input less than or equal to ten (10) million Btu per hour:
  - (1) RH-1, 0.05 MMBtu/hr.
  - (2) RH-2, 0.05 MMBtu/hr.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-8-4(1)]

There are no applicable requirements for these facilities.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
Compliance Branch**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
CERTIFICATION**

Source Name: VIM Recycling, Inc.  
Source Address: 64654 U.S. Highway 33, Goshen, Indiana 46526  
Mailing Address: 64654 U.S. Highway 33, Goshen, Indiana 46526  
FESOP No.: F-039-12395-00184

**This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.**

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify) \_\_\_\_\_
- 9 Report (specify) \_\_\_\_\_
- 9 Notification (specify) \_\_\_\_\_
- 9 Affidavit (specify) \_\_\_\_\_
- 9 Other (specify) \_\_\_\_\_

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE BRANCH  
P.O. Box 6015  
100 North Senate Avenue  
Indianapolis, Indiana 46206-6015  
Phone: 317-233-5674  
Fax: 317-233-5967**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
EMERGENCY OCCURRENCE REPORT**

Source Name: VIM Recycling, Inc.  
Source Address: 64654 U.S. Highway 33, Goshen, Indiana 46526  
Mailing Address: 64654 U.S. Highway 33, Goshen, Indiana 46526  
FESOP No.: F-039-12395-00184

**This form consists of 2 pages**

**Page 1 of 2**

**9** This is an emergency as defined in 326 IAC 2-7-1(12)  
CThe Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and  
CThe Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency:

Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

**Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency?    Y    N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO <sub>2</sub> , VOC, NO <sub>x</sub> , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT**  
**OFFICE OF AIR QUALITY**  
**Compliance Branch**

**FESOP Quarterly Report**

Source Name: VIM Recycling, Inc.  
Source Address: 64654 U.S. Highway 33, Goshen, Indiana 46526  
Mailing Address: 64654 U.S. Highway 33, Goshen, Indiana 46526  
FESOP No.: F-039-12395-00184  
Facility: Olathe Grinder  
Parameter: Diesel Motor Fuel Usage  
Limit: 20,000 gallons/year

YEAR: \_\_\_\_\_

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT**  
**OFFICE OF AIR QUALITY**  
**Compliance Branch**

**FESOP Quarterly Report**

Source Name: VIM Recycling, Inc.  
Source Address: 64654 U.S. Highway 33, Goshen, Indiana 46526  
Mailing Address: 64654 U.S. Highway 33, Goshen, Indiana 46526  
FESOP No.: F-039-12395-00184  
Facility: CBI Grinder  
Parameter: Diesel Motor Fuel Usage  
Limit: 7,800 gallons/year

YEAR: \_\_\_\_\_

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.  
Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
Compliance Branch**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: VIM Recycling, Inc.  
Source Address: 64654 U.S. Highway 33, Goshen, Indiana 46526  
Mailing Address: 64654 U.S. Highway 33, Goshen, Indiana 46526  
FESOP No.: F-039-12395-00184

Months: \_\_\_\_\_ to \_\_\_\_\_ Year: \_\_\_\_\_

Page 1 of 2

This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

**Permit Requirement** (specify permit condition #)

**Date of Deviation:**

**Duration of Deviation:**

**Number of Deviations:**

**Probable Cause of Deviation:**

**Response Steps Taken:**

**Permit Requirement** (specify permit condition #)

**Date of Deviation:**

**Duration of Deviation:**

**Number of Deviations:**

**Probable Cause of Deviation:**

**Response Steps Taken:**

<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

Form Completed By: \_\_\_\_\_  
Title/Position: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

Attach a signed certification to complete this report.



# Indiana Department of Environmental Management Office of Air Quality

## Addendum to the Technical Support Document for Federally Enforceable State Operating Permit (FESOP) Renewal

### Source Background and Description

Source Name:	VIM Recycling, Inc.
Source Location:	64654 U.S. Highway 33, Goshen, Indiana 46426
County:	Elkhart
SIC Code:	4953
Operation Permit No.:	F 039-12395-00184
Permit Reviewer:	ERG/DG

On January 24, 2001, the Office of Air Quality (OAQ) had a notice published in the Elkhart Truth, Elkhart, Indiana, stating that VIM Recycling, Inc. had applied for a Federally Enforceable State Operating Permit (FESOP) to operate a source that manufactures wood, plastic, and gypsum products using recycled wood, plastic, and gypsum. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed. Following the public notice period, a public hearing was held on January 8, 2002 at 6:00 pm in the Elkhart County Administrative Building, 117 N. 2nd Street, Goshen, IN 46526. No one from the public attended the hearing.

While the proposed FESOP was on public notice, IDEM and VIM Recycling were negotiating the terms of an Agreed Order to address complaints and previous violations of fugitive dust standards from outside grinding processes and storage piles at the Goshen facility. The Agreed Orders (2000-9603-A and 2000-9849-A) were issued on August 23, 2001. Pursuant to the Agreed Orders, IDEM, OAQ, made the following corrections to this permit.

1. Outdoor Grinding Operations. Pursuant to Agreed Orders 2000-9603-A and 2000-9849-A, signed August 23, 2001, the source is prohibited from conducting outdoor green wood grinding. Therefore, the fugitive dust emissions limitations for outdoor wood grinding processes Section D.1.9, as well as, the units listed in Section A.2 and all of Section D.4 that regulated outdoor grinding operations of green wood have been deleted from the permit.

#### ~~D.1.9 Control of Fugitive Dust~~

---

~~The source shall conduct continuous visual observation at all times to assure that no visible particulate is crossing the VIM property line at any time while the outdoor grinding process is in operation.~~

#### ~~D.1.409 Parametric Monitoring~~

#### ~~D.1.4110 Storage Piles~~

#### ~~D.1.4211 Record Keeping Requirements~~

- (a) To document compliance with Condition D.1.6 8, the Permittee shall maintain records of daily visible emission notations of the wood products cyclone/baghouse stack exhaust.
- (b) To document compliance with Condition D.1.8 9, the Permittee shall maintain the following:
- (d) To document compliance with Condition D.1.44 10, the Permittee shall maintain records of the visual inspections of outdoor ground wood storage piles.

#### D.1.4312 Reporting Requirements

Records of the information specified in Conditions **D.1.10** and D.1.11 shall be maintained for a minimum period of 24 months and made available upon request of the Office of Air Quality.

#### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

##### **Outdoor Grinding Operations**

- (a) One (1) hydraulic tub wood grinder, identified as Olathe, powered by a 312 hp diesel motor with a maximum capacity to grind 25 tons of "green" wood per hour, grinding green wood outdoors on the VIM property.
- (b) One (1) CBI wood grinder, identified as CBI, powered by an 800 hp diesel motor with a maximum capacity to grind 25 tons of "green" wood per hour, grinding green wood outdoors on the VIM property.

#### **SECTION D.4 FACILITY OPERATION CONDITIONS**

##### **Facility Description [326 IAC 2-8-4(10)]:**

##### **Outdoor Grinding Operations**

- (a) One (1) hydraulic tub wood grinder, identified as Olathe, powered by a 312 hp diesel motor with a maximum capacity to grind 25 tons of "green" wood per hour, grinding green wood outdoors on the VIM property.
- (b) One (1) CBI wood grinder, identified as CBI, powered by an 800 hp diesel motor with a maximum capacity to grind 25 tons of "green" wood per hour, grinding green wood outdoors on the VIM property.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

#### **Emission Limitations and Standards [326 IAC 2-8-4(1)]**

##### **D.4.1 NOx Emissions Limitation [326 IAC 2-8-4]**

- (a) Pursuant to [326 IAC 2-8-4] the annual diesel fuel consumption for the Olathe grinder shall be limited to 20,000 gallons/yr based on a 12-month period, rolled on a monthly basis. The annual diesel fuel consumption for the CBI grinder shall be limited to 7,800 gallons/yr based on a 12-month period, rolled on a monthly basis.
- (b) Pursuant to [326 IAC 2-8-4] these fuel consumption limits equate to NOx emission limits of 4.8 tons/yr and 2.4 tons/yr for the Olathe and CBI grinders, respectively.
- (c) These limits will render 326 IAC 2-7 (Part 70 Permit Program) and 326 IAC 2-2 (PSD Rules) not applicable.

#### D.4.2 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

The source will limit PM emissions to less than 250 tons per year and will render 326 IAC 2-2 (PSD Rules) not applicable. The source will be in compliance with the limitation by controlling PM emissions by an annual diesel fuel consumption limit. The PM emissions will be limited as follows:

Emission Unit	Allowable PM Emissions (lb/hr)
GBI grinder diesel motor	0.02
Olathe grinder diesel motor	0.04

#### D.4.3 FESOP PM10 Limit [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4 (FESOP), the source will limit PM10 emissions to less than 100 tons per year and will render 326 IAC 2-7 (Part 70 Permit Program) not applicable. The source will be in compliance with the limitation by controlling PM10 emissions by an annual diesel fuel consumption limit. The PM10 emissions will be limited as follows:

Emission Unit	Allowable PM10 Emissions (lb/hr)
GBI grinder diesel motor	0.02
Olathe grinder diesel motor	0.04

#### D.4.4 Fugitive Dust Emissions [326 IAC 6-4-2]

Emissions from fugitive dust from the outdoor "green" wood grinding processes listed in D.1 shall be limited to less than the following:

- (a) A source or combination of sources which cause to exist fugitive dust concentrations greater than sixty-seven percent (67%) in excess of ambient upwind concentrations as determined by the following formula:

$$P = 100(R-U)/U \quad \text{where } P = \text{Percentage increase}$$

R = Number of particles of fugitive dust measured at the downward receptor site

U = Number of particles of fugitive dust measured at upwind of background site

- (b) The fugitive dust is comprised of fifty percent (50%) or more respirable dust, then the percent increase of dust concentration in subdivision (1) of this section shall be modified as follows:

$$P_R = (1.5 \cdot N) \cdot P \quad \text{where } N = \text{Fraction of fugitive dust that is respirable dust}$$

PR = allowable percentage increase in dust concentration above backgrounds

P = no value greater than sixty-seven percent (67%)

- (c) The ground level ambient air concentrations exceed fifty (50) micrograms per cubic meter above background concentrations for a sixty (60) minute period.

- (d) If fugitive dust is visible crossing the boundary or property line of a source. This subdivision may be refuted by factual data expressed in subdivision (1), (2) or (3) of this section.

#### ~~D.4.5 Storage Piles~~

- 
- ~~(a) Pursuant to Agreed Orders 2000-9603-A and 2000-9849-A signed on August 23, 2001, outdoor storage piles at the source shall:~~
- ~~(1) Be maintained with a maximum height of twenty (20) feet and a seventy-five (75) foot barrier between the storage pile(s) and the facility property line (effective January 1, 2002), and~~
- ~~(2) Not be located south of the imaginary line running east to west across the northern face of the facilities northern-most building (effective May 1, 2002).~~
- ~~(b) Pursuant to Agreed Orders 2000-9603-A and 2000-9849-A signed on August 23, 2001, no screening or other processing of any materials that could create fugitive dust emissions shall be conducted outdoors (effective January 1, 2002). Moving or loading or material is allowed.~~

#### **Compliance Determination Requirements**

#### ~~D.4.6 Testing Requirements~~

- 
- ~~The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the NOx limit specified in Condition D.4.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.~~

#### **Compliance Monitoring Requirements [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]**

#### ~~D.4.7 Monitoring~~

- 
- ~~The source shall maintain a monthly log of the fuel usage for the Olathe and CBI grinder diesel motors.~~

#### **Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)][326 IAC 2-8-16]**

#### ~~D.4.8 Record Keeping and Reporting Requirements~~

- 
- ~~To document compliance with Condition D.4.1, D.4.2, and D.4.3 the Permittee shall maintain records in accordance with D.4.3. Records maintained shall be complete and sufficient to establish compliance with the fuel consumption limit established in Condition D.4.1.~~

#### ~~D.4.9 Reporting Requirements~~

- 
- ~~A quarterly summary of the information to document compliance with Conditions D.4.1 and D.4.4 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~

2. Wood Product Line - Outdoor Storage Piles. Pursuant to Agreed Orders 2000-9603-A and 2000-9849-A signed on August 23, 2001, the following additions were made to the permit to specify the maintenance, inspection, and recordkeeping requirements for outdoor storage piles.

#### **D.1.4 Storage Piles**

- 
- (a) Pursuant to Agreed Orders 2000-9603-A and 2000-9849-A signed on August 23, 2001, outdoor storage piles at the source shall:**

- (1) Be maintained with a maximum height of twenty (20) feet and a seventy-five (75) foot barrier between the storage pile(s) and the facility property line (effective January 1, 2002), and
  - (2) Not be located south of the imaginary line running east-to-west across the northern face of the facilities northern-most building (effective May 1, 2002).
- (b) Pursuant to Agreed Orders 2000-9603-A and 2000-9849-A signed on August 23, 2001, no screening or other processing of any materials that could create fugitive dust emissions shall be conducted outdoors (effective January 1, 2002). Moving or loading of material is allowed.

#### **D.1.10 Storage Piles**

---

Pursuant to Agreed Orders 2000-9603-A and 2000-9849-A signed on August 23, 2001, the source shall inspect all ground wood material stored outside for signs of spontaneous combustion. Any fire discovered shall be extinguished immediately.

#### **D.1.11 Record Keeping Requirements**

---

- (d) To document compliance with Condition D.1.10 the Permittee shall maintain records of the visual inspections of outdoor ground wood storage piles.

3. Plastic and Gypsum Product Lines - Outdoor Storage Piles. Pursuant to Agreed Orders 2000-9603-A and 2000-9849-A signed on August 23, 2001, the following additions were made to the permit to specify the maintenance requirements for outdoor storage piles.

#### **D.2.4 Storage Piles**

---

- (a) Pursuant to Agreed Orders 2000-9603-A and 2000-9849-A signed on August 23, 2001, outdoor storage piles at the source shall:
  - (1) Be maintained with a maximum height of twenty (20) feet and a seventy-five (75) foot barrier between the storage pile(s) and the facility property line (effective January 1, 2002), and
  - (2) Not be located south of the imaginary line running east-to-west across the northern face of the facilities northern-most building (effective May 1, 2002).
- (b) Pursuant to Agreed Orders 2000-9603-A and 2000-9849-A signed on August 23, 2001, no screening or other processing of any materials that could create fugitive dust emissions shall be conducted outdoors (effective January 1, 2002). Moving or loading of material is allowed.

#### **D.3.5 Storage Piles**

---

- (a) Pursuant to Agreed Orders 2000-9603-A and 2000-9849-A signed on August 23, 2001, outdoor storage piles at the source shall:
  - (1) Be maintained with a maximum height of twenty (20) feet and a seventy-five (75) foot barrier between the storage pile(s) and the facility property line (effective January 1, 2002), and

- (2) Not be located south of the imaginary line running east-to-west across the northern face of the facilities northern-most building (effective May 1, 2002).**
- (b) Pursuant to Agreed Orders 2000-9603-A and 2000-9849-A signed on August 23, 2001, no screening or other processing of any materials that could create fugitive dust emissions shall be conducted outdoors (effective January 1, 2002). Moving or loading of material is allowed.**

4. Because Section D.4 was deleted from the permit Section D.5 became Section D.4. Pursuant to Agreed Orders 2000-9603-A and 2000-9849-A signed on August 23, 2001, D.4.4 was added to the permit to specify: maintenance requirements for outdoor storage piles.

#### **SECTION D.54**

#### **FACILITY OPERATION CONDITIONS**

##### **Facility Description [326 IAC 2-8-4(10)]:**

##### **Paper Conveyor**

- (a) One (1) paper conveyor with a maximum convey 4 tons of paper per hour and exhausting to the atmosphere.**

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

#### **Emission Limitations and Standards [326 IAC 2-8-4(1)]**

##### **D.54.1 Particulate Matter (PM) [326 IAC 6-3-2]**

##### **D.54.2 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]**

The source will limit PM emissions to less than 250 tons per year and will render 326 IAC 2-2 (PSD Rules) not applicable. The source will limit PM emissions by complying with the allowable PM emission limit specified in Condition D.5.1.

##### **D.54.3 FESOP PM10 Limit [326 IAC 2-8-4]**

Pursuant to 326 IAC 2-8-4 (FESOP), the source will limit PM10 emissions to less than 100 tons per year and will render 326 IAC 2-7 (Part 70 Permit Program) not applicable. The source will limit PM10 emissions by complying with the allowable PM emission limit specified in Condition D.5.1.

##### **D.4.4 Storage Piles**

- (a) Pursuant to Agreed Orders 2000-9603-A and 2000-9849-A signed on August 23, 2001, outdoor storage piles at the source shall:**
  - (1) be maintained with a maximum height of twenty (20) feet and a seventy-five (75) foot barrier between the storage pile(s) and the facility property line (effective January 1, 2002), and**
  - (2) not be located south of the imaginary line running east-to-west across the northern face of the facilities northern-most building (effective May 1, 2002).**

- (b) Pursuant to Agreed Orders 2000-9603-A and 2000-9849-A signed on August 23, 2001, no screening or other processing of any materials that could create fugitive dust emissions shall be conducted outdoors (effective January 1, 2002). Moving or loading of material is allowed.
- (c) Pursuant to Agreed Orders 2000-9603-A and 2000-9849-A signed on August 23, 2001, no biomass shall be on-site unless the material is used as a berm and the material is seeded with erosion-preventing vegetation (effective May 1, 2002).

#### D.54.5 Testing Requirements

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#### D.54.6 Visible Emissions Notations

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#### D.54.7 Record Keeping Requirements

---

- (a) To document compliance with Condition D.5.5 4.6, the Permittee shall maintain records of visible emission notations of the paper conveyor stack exhaust once per shift.

#### D.54.8 Reporting Requirements

---

Records of the information specified in Condition D.5.5 4.7 shall be maintained for a minimum period of 24 months and made available upon request of the Office of Air Quality.

5. Because Section D.4 was deleted from the permit Section D.6 became Section D.5.

### SECTION D.6 5 FACILITY OPERATION CONDITIONS

#### Facility Description [326 IAC 2-8-4(10)]:

##### Insignificant Activities

- (a) Three (3) natural gas-fired forced air heaters with a heat input less than or equal to ten (10) million Btu per hour:
  - (1) FA-1, 0.1 MMBtu/hr.
  - (2) FA-2, 0.1 MMBtu/hr.
  - (3) FA-3, 0.1 MMBtu/hr.
- (b) Two (2) natural gas-fired radiant heaters with a heat input less than or equal to ten (10) million Btu per hour:
  - (1) RH-1, 0.05 MMBtu/hr.
  - (2) RH-2, 0.05 MMBtu/hr.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Upon further review, IDEM, OAQ, made the following corrections to this permit.

6. IDEM, OAQ, made the following correction to B.10 Compliance with Permit Conditions. This section has been revised to clarify that noncompliance with any requirement of this permit may result in an enforcement action against the permittee, an action to modify, revoke, reissue or terminate the source's permit, and/or a denial of the permittee's application to renew the permit.

**B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]**

---

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit ~~except those specifically designated as not federally enforceable~~, is grounds for:
- (1) Enforcement action;
  - (2) Permit termination, revocation and reissuance, or modification; and
  - (3) Denial of a permit renewal application.

7. IDEM, OAQ, made the following changes in Section C to make this permit consistent with current FESOP permits.

**C.1 Overall Source Limit [326 IAC 2-8]**

---

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

- (a) Pursuant to 326 IAC 2-8:
- (1) The potential to emit any regulated pollutant, **except particulate matter (PM)**, from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period. This limitation shall also make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) and 326 IAC 2-3 (Emission Offset) not applicable.

**C.18 Emission Statement [326 IAC 2-6] [326 IAC 2-8-4(3)]**

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- (a) The Permittee shall submit an ~~annual~~ emission statement certified pursuant to the requirements of 326 IAC 2-6. This ~~annual~~ statement must be received by April 15 of ~~each year~~ **in accordance with the compliance schedule specified in 326 IAC 2-6-3** and must comply with the minimum requirements specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8) (~~Emission Statement Operating Year~~). The ~~annual~~ statement must be submitted to:

Indiana Department of Environmental Management  
Technical Support and Modeling Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The emission statement does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The ~~annual~~ emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

**C.20 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]**

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- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).



- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management  
Compliance ~~Data Section~~ **Branch**, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, ~~all any quarterly~~ reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. ~~All reports do~~ **The report does** require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) The first report ~~shall covered~~ the period commencing on the date of issuance of ~~this permit~~ **the original FESOP** permit and ~~ending ended~~ on the last day of the reporting period. **All subsequent** Reporting periods ~~are shall be~~ based on calendar years.

8. The name Compliance Data Section was updated to the correct name Compliance Branch throughout the permit and typographical errors in B.11 and B.20 were corrected.

**B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]**

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by ~~a an~~ authorized individual of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

**B.20 Permit Revision Requirement [326 IAC 2-8-11.1]**

A modification, construction, or reconstruction is governed **by the requirements of** 326 IAC 2 and 326 IAC 2-8-11.1.

9. A.5 Prior Permits Superseded was added to the permit to help clarify the intent of the new rule 326 IAC 2-1.9.5.

**A.5 ~~Prior Permit Conditions~~**

- ~~(a) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits.~~
- ~~(b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAQ, **(and local agency when applicable)** shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued.~~

**A.5 Prior Permits Superseded [326 IAC 2-1.1-9.5]**

- 
- (a) **All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either**
- (1) **incorporated as originally stated,**
  - (2) **revised, or**
  - (3) **deleted**
- by this permit.**
- (b) **All previous registrations and permits are superseded by this permit.**

10. The IDEM, OAQ, has revised Condition B.15 Deviations from Permit Requirements and Conditions and certain Parametric Monitoring conditions in the D section of the permit to address concerns regarding the independent enforceability of permit conditions [see 326 IAC 2-8-4(5)]. The Parametric Monitoring conditions have been revised to establish normal operating conditions for the emission unit or control device and to require implementation of the compliance response plan when monitoring indicates operation is outside the normal range. Language that inferred that operating outside of the normal range could be considered by itself to be a deviation was removed. B.15 was revised to remove language that could be considered to grant exemptions from permit requirements and to clarify reporting obligations.

**B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]**

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- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. ~~Deviations that are required to be reported by an applicable requirement~~ **A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit**, shall be reported according to the schedule stated in the applicable requirement and ~~do~~ **does** not need to be included in this report.

~~The notification by the Permittee~~ **Quarterly Deviation and Compliance Monitoring Report** does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit. ~~or a rule. It does not include:~~
- (1) ~~An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or~~
  - (2) ~~Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.~~

~~A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.~~

- (c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

#### D.1.9 Parametric Monitoring

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The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the woodworking process, at least once weekly when the woodworking process is in operation when venting to the atmosphere. ~~Unless operated under conditions for which the Compliance Response Plan specifies otherwise,~~ **When for any one reading, the pressure drop across the baghouse shall be maintained within is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test. The, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports.** ~~for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.~~ **A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.**

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

#### D.2.8 Parametric Monitoring

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The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the plastic grinding process, at least once weekly when the plastic grinding process is in operation when venting to the atmosphere. ~~Unless operated under conditions for which the Compliance Response Plan specifies otherwise,~~ **When for any one reading, the pressure drop across the baghouse shall be maintained within is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test. The, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports.** ~~for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.~~ **A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.**

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

#### D.3.9 Parametric Monitoring

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The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the shredding, conveying, hammer milling, classifying, augering, and storage processes are at least once weekly when the shredding, conveying, hammer milling, classifying, augering, and storage processes are in operation when venting to the atmosphere. ~~Unless operated under conditions for which the Compliance Response Plan specifies otherwise,~~ **When for any one reading, the pressure drop across the baghouse shall be maintained within is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test. The, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports.** ~~for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.~~ **A pressure reading that is outside the above mentioned range is not a deviation from this permit.**

**Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.**

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

11. Several conditions were modified by removing language stating that the condition was not federally enforceable. Federal law states that failure to comply with any permit condition issued under a program that has been approved into a State Implementation Plan (SIP) is to be treated as a violation of the SIP (40 CFR 52.23). This has the effect of making all FESOP conditions federally enforceable. Indiana's FESOP program was approved as a part of Indiana's SIP at 40 CFR 52.788. Neither the program nor the underlying rule, 326 IAC 2-8 contains provisions for designating certain conditions as not federally enforceable.

**C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]**

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. ~~326 IAC 4-1-3(a)(2)(A) and (B) are not federally enforceable.~~

**C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]**

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2. ~~326 IAC 9-1-2 is not federally enforceable.~~

**C.5 Fugitive Dust Emissions [326 IAC 6-4]**

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). ~~326 IAC 6-4-2(4) is not federally enforceable.~~

**C.7 Stack Height [326 IAC 1-7]**

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. ~~The provisions of 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4(d)(3), (e), and (f), and 326 IAC 1-7-5(d) are not federally enforceable.~~

12. 326 IAC 2-8-3 requires any application form, report, or compliance certification to be certified by the authorized individual. IDEM, OAQ has revised C.8 Asbestos Abatement Projects to clarify that the asbestos notification does not require a certification by the authorized individual, but it does need to be certified by the owner or operator. IDEM, OAQ has revised C.17 Actions Related to Noncompliance Demonstrated by a Stack Test; a certification by the authorized individual is required for the notification sent in response to non-compliance with a stack test.

**C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]**

- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management  
Asbestos Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

**The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project.** The notifications do not require a certification by the "authorized individual" as defined by 326 IAC2-1.1-1(1).

C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4]  
[326 IAC 2-8-5]

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- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

13. The IDEM, OAQ has restructured C.16 to clarify the contents and implementation of the compliance response plan. The name of the condition has changed to better reflect the contents of the condition. The language regarding the OAQ's discretion to excuse failure to perform monitoring under certain conditions has been deleted. The OAQ retains this discretion to excuse minor incidents of missing data; however, it is not necessary to state criteria regarding the exercise of that discretion in the permit. The title Compliance Monitoring Plan - Failure to Take Response Steps has been changed to Compliance Response Plan - Preparation, Implementation, Records, and Reports throughout the permit.

C.16 Compliance Monitoring **Response Plan - Failure to Take Response Steps Preparation, Implementation, Records, and Reports** [326 IAC 2-8-4] [326 IAC 2-8-5]

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- (a) The Permittee is required to **prepare** ~~implement: a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. The compliance monitoring plan can be either an entirely new document, consist in whole of information contained in other documents, or consist of a combination of new information and information contained in other documents. If the compliance monitoring plan incorporates by reference information contained in other documents, the Permittee shall identify as part of the compliance monitoring plan the documents in which the information is found. The elements of the compliance monitoring plan are:~~
- ~~(1) This condition;~~
  - ~~(2) The Compliance Determination Requirements in Section D of this permit;~~
  - ~~(3) The Compliance Monitoring Requirements in Section D of this permit;~~
  - ~~(4) The Record Keeping and Reporting Requirements in Section C (General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and~~
  - ~~(5) A~~ **a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP's shall be submitted to IDEM, OAQ upon request and shall be subject to review and approval by IDEM, OAQ. The CRP shall be prepared within ninety (90) days after issuance of this permit by the**

Permittee, **supplemented from time to time by the Permittee**, and maintained on site, and ~~is~~ comprised of:

~~(A)(1)~~ Reasonable response steps that may be implemented in the event that ~~compliance-related information indicates that~~ a response step is needed pursuant to the requirements of Section D of this permit; and **an expected timeframe for taking reasonable response steps.**

~~(B) — A time schedule for taking reasonable response steps including a schedule for devising additional response steps for situations that may not have been predicted.~~

**(2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.**

(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition **as follows:** ~~Failure to take reasonable response steps may constitute a violation of the permit.~~

**(1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or**

**(2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.**

**(3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.**

**(4) Failure to take reasonable response steps shall constitute a violation of the permit.**

(c) ~~Upon investigation of a compliance monitoring excursion, the~~ **The** Permittee is ~~excused from taking~~ **not required to take any** further response steps for any of the following reasons:

**(1) A false reading occurs due to the malfunction of the monitoring equipment and This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.**

**(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously**

submitted a request for an administrative amendment to the permit, and such request has not been denied.

- (3) An automatic measurement was taken when the process was not operating.
- (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) **When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.**
- ~~(d)(e)~~ **Records shall be kept of all instances in which the compliance-related information was not met and of all response steps taken. The Permittee shall record all instances when response steps are taken.** In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- ~~(e)(f)~~ **Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed at all times when the equipment emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.** If monitoring is required by Section D and the equipment is not operating, then the Permittee may record the fact that the equipment is not operating or perform the required monitoring.
- (f) **At its discretion, IDEM may excuse the Permittee's failure to perform the monitoring and record keeping as required by Section D, if the Permittee provides adequate justification and documents that such failures do not exceed five percent (5%) of the operating time in any quarter. Temporary, unscheduled unavailability of qualified staff shall be considered a valid reason for failure to perform the monitoring or record keeping requirements in Section D.**

## **Indiana Department of Environmental Management Office of Air Quality**

### **Technical Support Document (TSD) for a Federally Enforceable Operating Permit (FESOP)**

#### **Source Background and Description**

**Source Name:** VIM Recycling, Inc.  
**Source Location:** 64654 U.S. Highway 33, Goshen, Indiana 46426  
**County:** Elkhart  
**SIC Code:** 4953  
**Operation Permit No.:** F 039-12395-00184  
**Permit Reviewer:** ERG/DG

The Office of Air Quality (OAQ) has reviewed a FESOP application from VIM Recycling, Inc., relating to the operation of a source that manufactures wood, plastic, and gypsum products using recycled wood, plastic, and gypsum as raw materials.

#### **Permitted Emission Units and Pollution Control Equipment**

The source consists of the following permitted emission units and pollution control devices:

##### **Wood Product Line**

- (a) One (1) wood hog grinder with a maximum capacity to grind 25 tons of wood per hour, using one (1) cyclone/baghouse (WCD-1) for controlling particulate matter and exhausting to one (1) stack designated WS-1.
- (b) One (1) wood product conveyor with a maximum capacity to convey 25 tons of wood per hour, using one (1) cyclone/baghouse (WCD-1) for controlling particulate matter and exhausting to one (1) stack designated WS-1.

##### **Plastic Product Line**

- (a) One (1) vinyl hog grinder with a maximum capacity to grind 2.5 tons of polyethylene or polyvinyl chloride per hour, using one (1) cyclone/baghouse (VCD-1) for controlling particulate matter and exhausting to one (1) stack designated VS-1.

##### **Gypsum Product Line**

- (a) One gypsum shredder with a maximum capacity to shred 15 tons of gypsum per hour, using one (1) cyclone/baghouse (GCD-1) for controlling particulate matter and exhausting to one (1) stack designated GS-1.
- (b) One (1) gypsum product conveyor with a maximum capacity to convey 15 tons of gypsum per hour, using one (1) cyclone/baghouse (GCD-1) for controlling particulate matter and exhausting to one (1) stack designated GS-1.
- (c) One (1) gypsum hammer mill with a maximum capacity to crush 15 tons of gypsum per hour, using one (1) cyclone/baghouse (GCD-1) for controlling particulate matter and exhausting to one (1) stack designated GS-1.



- (d) One (1) gypsum products classifier with a maximum capacity to process 15 tons of gypsum per hour, using one (1) cyclone/baghouse (GCD-1) for controlling particulate matter and exhausting to one (1) stack designated GS-1.
- (e) One (1) gypsum rock auger with a maximum capacity to process 15 tons of gypsum per hour, using one (1) cyclone/baghouse (GCD-1) for controlling particulate matter and exhausting to one (1) stack designated GS-1.
- (f) One (1) gypsum powder silo with a maximum storage capacity of 15 tons of gypsum per hour, using one (1) cyclone/baghouse (GCD-1) for controlling particulate matter and exhausting to one (1) stack designated GS-1.

#### **Outdoor Grinding Operation**

One (1) hydraulic tub wood grinder, identified as Olathe, powered by a 312 hp diesel motor with a maximum capacity to grind 25 tons of "green" wood per hour, grinding green wood outdoors on the VIM property.

#### **Paper Conveyor**

One (1) paper conveyor with a maximum convey 4 tons of paper per hour and exhausting to the atmosphere.

### **Unpermitted Emission Units and Pollution Control Equipment**

The source also consists of the following unpermitted facilities/units:

- (1) Outdoor Grinding Operation:  
One (1) CBI wood grinder, identified as CBI, powered by an 800 hp diesel motor with a maximum capacity to grind 25 tons of "green" wood per hour, grinding green wood outdoors on the VIM property.

### **Insignificant Activities**

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Three (3) natural gas-fired forced air heaters with a heat input less than or equal to ten (10) million Btu per hour:
  - (1) FA-1, 0.1 MMBtu/hr.
  - (2) FA-2, 0.1 MMBtu/hr.
  - (3) FA-3, 0.1 MMBtu/hr.
- (b) Two (2) natural gas-fired radiant heaters with a heat input less than or equal to ten (10) million Btu per hour:
  - (1) RH-1, 0.05 MMBtu/hr.
  - (2) RH-2, 0.05 MMBtu/hr.

### **Existing Approvals**

There are no existing approvals for this source.

### **Enforcement Issue**

- (a) IDEM is aware that equipment has been constructed and operated prior to receipt of the proper permit. The subject equipment is listed in this Technical Support Document

under the condition entitled *Unpermitted Emission Units and Pollution Control Equipment*.

- (b) IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.

## Recommendation

The staff recommends to the Commissioner that the FESOP be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete FESOP application for the purposes of this review was received on June 15, 2000. Additional information was received on July 13, 2000.

## Emission Calculations

See Appendix A of this document for detailed emissions calculations (pages 1 through 9).

## Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA.”

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	462.1
PM-10	461.0
SO <sub>2</sub>	14.2
VOC	6.0
CO	30.4
NO <sub>x</sub>	127

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential To Emit (tons/year)
Benzene	3.68E-6
Cadmium	1.93E-6
Chromium	2.45E-6
Dichlorobenzene	2.10E-6
Formaldehyde	1.31E-4
Hexane	3.15E-3
Lead	8.76E-7
Manganese	6.66E-7

HAP's	Potential To Emit (tons/year)
Nickel	3.68E-6
TOTAL	3.31E-3

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of PM10 and nitrogen oxides (NOx) is equal to or greater than one-hundred (100) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) Pursuant to 326 IAC 2-8, this source, otherwise required to obtain a Title V permit, has agreed to accept a permit with federally enforceable limits that restrict PTE to below Title V emission levels. Therefore, this source will be issued a Federally Enforceable State Operating Permit (FESOP). Through the use of cyclone/baghouses, the PM and PM10 emissions from the wood, plastic, and gypsum product lines will be limited to less than 100 tons per year. Through limits on fuel usage, the PM, PM10, and NOx emissions from the Olathe and CBI grinder diesel motors will be limited to less than 100 tons per year. Therefore, the Title V and PSD requirements are not applicable and the source is in compliance with 326 IAC 6-3.

#### Actual Emissions

No previous emission data has been received from this source.

#### Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Federally Enforceable State Operating Permit. Pursuant to CP-039-3530-00184, the wood product, plastic product, and gypsum product line cyclone/baghouses limit the emissions of PM and PM10. The fuel consumption limit for the Olathe grinder (20,000 gallons/yr) and the CBI grinder (7,800 gallons/yr) diesel engines reduce emissions of SO<sub>2</sub>, VOC, CO, and NO<sub>x</sub>.

	Limited Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs
Wood Product Line - Hog grinder and conveyor	7.14	7.14	0	0	0	0	neg.
Plastic Product Line - Hog grinder	2.23	2.23	0	0	0	0	neg.
Gypsum Product Line - Shredder, conveyor, hammer mill, classifier, auger, and storage silo	7.14	7.14	0	0	0	0	neg.
Olathe Grinder	0.18	0.18	0.16	0.20	0.52	2.43	0
CBI Grinder	0.09	0.09	0.57	0.13	1.19	4.80	0
Paper Conveyor	45.55	45.55	0	0	0	0	0
Total Emissions	62.38	62.38	0.73	0.32	1.71	9.60	neg.

### County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
PM-10	Attainment
SO <sub>2</sub>	Attainment
NO <sub>2</sub>	Attainment
Ozone	Attainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO<sub>x</sub>) are precursors for the formation of ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as attainment for ozone.

### Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source.

### State Rule Applicability-Entire Source

326 IAC 1-6-3 (Preventive Maintenance Plan)

- (a) The Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emissions units;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) The Permittee shall implement the PMP(s) as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM and OAQ upon request and shall be subject to review and approval by IDEM and OAQ.

**326 IAC 2-8-4 (FESOP) and 326 IAC 2-2 (PSD Rules)**

The source will limit PM<sub>10</sub> emissions to less than 100 tons per year and will render 326 IAC 2-7 (Part 70 Permit Program) not applicable. For this source, PM<sub>10</sub> emissions equal PM emissions, therefore the source will limit PM emissions to less than 250 tons per year and will also render 326 IAC 2-2 (PSD) not applicable. The source will be in compliance with the limitation by controlling PM and PM<sub>10</sub> emissions with a cyclone and baghouse, in series. The PM and PM<sub>10</sub> emissions will be limited as follows:

<b>Emission Unit</b>	<b>Allowable PM Emissions (lb/hr)</b>
Wood product line (WCD-1)	1.63
Plastic Product line (VCD-1)	0.51
Gypsum product line (GCD-1)	1.63
Olathe grinder diesel motor	0.04
CBI grinder diesel motor	0.02
Paper Conveyor	10.40

**326 IAC 2-6 (Emission Reporting)**

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than ten (10) tons per year of NO<sub>x</sub>. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8) (Emission Statement Operating Year).

**326 IAC 5-1 (Opacity Emissions Limitations)**

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute non overlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

**326 IAC 8 (VOC Rules)**

The potential VOC emissions from this source are six (6) tons per year and the source does not have any of the facilities listed in 326 IAC 8-2 through 8-13. Therefore, the requirements of 326 IAC 8 do not apply, including 326 IAC 8-1-6.

**State Rule Applicability – Wood Products Operation**

**326 IAC 6-3-2 (Process Operations)**

The particulate matter (PM) from the grinding and transporting shall be not exceed 35.4 pounds per hour when operating at a process weight of 50,000 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

The cyclone/baghouse shall be in operation at all times during the wood grinding, transporting and screening operation, in order to comply with this limit.

#### 326 IAC 6-4-2 Fugitive Dust Emissions Limitations

Pursuant to 326 IAC 6-4-2, emissions of particulate from outdoor "green" wood grinding shall be limited according to less than the following:

- (1) A source or combination of sources which cause to exist fugitive dust concentrations greater than sixty-seven percent (67%) in excess of ambient upwind concentrations as determined by the following formula:

$$P = 100(R-U)/U \quad \text{where } P = \text{Percentage increase} \\ R = \text{Number of particles of fugitive dust measured at the} \\ \text{downward receptor site} \\ U = \text{Number of particles of fugitive dust measured at} \\ \text{upwind of background site}$$

- (2) The fugitive dust is comprised of fifty percent (50%) or more respirable dust, then the percent increase of dust concentration in subdivision (1) of this section shall be modified as follows:

$$P_R = (1.5 \pm N) * P \quad \text{where } N = \text{Fraction of fugitive dust that is respirable dust} \\ P_R = \text{Allowable percentage increase in dust} \\ \text{concentration above backgrounds} \\ P = \text{No value greater than sixty-seven percent (67\%)}$$

- (3) The ground level ambient air concentrations exceed fifty (50) micrograms per cubic meter above background concentrations for a sixty (60) minute period.
- (4) If fugitive dust is visible crossing the boundary or property line of a source. This subdivision may be refuted by factual data expressed in subdivision (1), (2) or (3) of this section.

#### State Rule Applicability – Plastic Products Operation

##### 326 IAC 6-3-2 (Process Operations)

The particulate matter (PM) from the grinding operation shall not exceed 7.6 pounds per hour when operating at a process weight of 1,000 pounds per hour.

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

The cyclone/baghouse shall be in operation at all times during the plastic grinding operation in order to comply with this limit.

### **State Rule Applicability – Gypsum Products Operation**

#### **326 IAC 6-3-2 (Process Operations)**

The particulate matter (PM) from the grinding, transporting, screening, and storage shall not exceed 25.2 pounds per hour when operating at a process weight of 30,000 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

The cyclone/baghouse shall be in operation at all times during the gypsum grinding, transporting, screening, and storage operation in order to comply with this limit.

### **State Rule Applicability - Internal Combustion**

#### **326 IAC 2-8-4 (FESOP)**

The source will limit NOx emissions to less 100 tons per year and will render 326 IAC 2-7 (Part 70 Permit Program) and 326 IAC 2-2 (PSD Rules) not applicable. The source will be in compliance with the limitation by controlling NOx emissions with a fuel usage limit. The annual diesel fuel consumption for the Olathe grinder shall be limited to 20,000 gallons/yr. The annual diesel fuel consumption for the CBI grinder shall be limited to 7,800 gallons/yr. These fuel consumption limits equate to NOx emission limits of 4.8 tons/yr and 2.4 tons/yr for the Olathe and CBI grinders, respectively.

### **State Rule Applicability - Paper Conveyor**

#### **326 IAC 6-3-2 (Process Operations)**

The particulate matter (PM) from the paper conveyor shall not exceed 10.40 pounds per hour when operating at a process weight rate of 8,000 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

#### **326 IAC 2-8-4 (FESOP) and 326 IAC 2-2 (PSD Rules)**

This source will limit PM10 emissions to less than 100 tons per year and will render 326 IAC 2-7 (Part 70 Permit Program) not applicable. For this source, PM10 emission equal PM emissions. Therefore, the source will be in compliance with the PM10 limitation by complying with the allowable PM emission limit under 326 IAC 6-3-2 (Process Operations).

### **Compliance Requirements**

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a

result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

1. The wood products line has applicable compliance monitoring conditions as specified below.

- (a) Daily visible emission notations of the wood products cyclone and baghouse exhaust stack (WS-1) shall be performed during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal. For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.
- (b) The Permittee shall record the total static pressure drop across baghouse WCD-1 used in conjunction with the wood grinding and conveying processes at least once weekly when the processes are in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of 3.0 and 6.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAQ and shall be calibrated at least once every six (6) months.

These monitoring conditions are necessary because the cyclone/baghouse must operate properly to ensure compliance with 326 IAC 5-1 (Opacity Emissions Limitations), 326 IAC 6-3-2 (Process Operations), and 326 IAC 2-8 (FESOP).

2. The plastic products line has applicable compliance monitoring conditions as specified below.

- (a) Daily visible emission notations of the plastic products cyclone and baghouse exhaust stack (VS-1) shall be performed during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal. For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest



emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

- (b) The Permittee shall record the total static pressure drop across baghouse VCD-1 used in conjunction with the plastic grinding process at least once weekly when the process is in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of 3.0 and 6.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAQ and shall be calibrated at least once every six (6) months.

- (c) An inspection shall be performed each calendar quarter of all bags controlling the plastic grinding operation when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting indoors. All defective bags shall be replaced.

In the event that bag failure has been observed:

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

These monitoring conditions are necessary because the cyclone/baghouse must operate properly to ensure compliance with 326 IAC 5-1 (Opacity Emissions Limitations), 326 IAC 6-3-2 (Process Operations), and 326 IAC 2-8 (FESOP).

3. The gypsum products line has applicable compliance monitoring conditions as specified below.

- (a) Daily visible emission notations of the gypsum products cyclone and baghouse exhaust stack (GS-1) shall be performed during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal. For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest

emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

- (b) The Permittee shall record the total static pressure drop across baghouse GCD-1 used in conjunction with the gypsum grinding, conveying, and storage processes at least once weekly when the process is in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of 3.0 and 6.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAQ and shall be calibrated at least once every six (6) months.

- (c) An inspection shall be performed each calendar quarter of all bags controlling the gypsum shredding, conveying, hammer milling, classifying, augering, and storage operations when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting indoors. All defective bags shall be replaced.

In the event that bag failure has been observed:

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

These monitoring conditions are necessary because the cyclone/baghouse must operate properly to ensure compliance with 326 IAC 5-1 (Opacity Emissions Limitations), 326 IAC 6-3-2 (Process Operations), and 326 IAC 2-8 (FESOP).

4. The internal combustion facilities have applicable compliance monitoring conditions as specified below.

The source shall maintain a monthly log of the fuel usage for the Olathe and CBI grinder diesel motors.

The monitoring conditions are necessary because the Olathe and CBI grinder diesel motors are limited to an annual diesel fuel consumption of 20,438 gallons/yr and 8,029

gallons/yr, respectively, to comply with the NO<sub>x</sub> emission limit. Pursuant to 326 IAC 2-8, this source, otherwise required to obtain a Title V permit, has agreed to accept a permit with federally enforceable limits that restrict PTE to below Title V emission levels.

5. The paper conveyor has applicable compliance monitoring conditions as specified below.

Daily visible emissions notations of the paper conveyor shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

The monitoring conditions are necessary to ensure compliance with 326 IAC 5-1 (Opacity Emissions Limitations) and 326 IAC 2-8 (FESOP).

### **Air Toxic Emissions**

Indiana presently requests applicants to provide information on emissions of the 188 hazardous air pollutants (HAPs) set out in the 1990 Clean Air Act. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Quality (OAQ) FESOP Application Form GSD-08.

- (a) This source will emit levels of air toxics less than those which constitute a major source according to Section 112 of the 1990 Clean Air Act.
- (b) See attached calculations for detailed air toxic calculations. (Appendix A, pages 3 and 5).

### **Conclusion**

The operation of this wood, plastic, and gypsum recycling facility shall be subject to the conditions of the attached proposed FESOP No.: F039-12395-00184.